



Data Protection and Retention Policy

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Key details

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Data Protection

1. Overview

Introduction

In order to operate Manchester Luncheon Club needs to gather, store and use certain forms of information about individuals.

These can include members, speakers, business contacts and other people the Club has a relationship with or regularly needs to contact.

This policy explains how this data should be collected, stored and used in order to meet Manchester Luncheon Club's data protection standards and comply with the General Data Protection Regulations (GDPR).

Why is this policy important?

This policy ensures that Manchester Luncheon Club:

- Protects the rights of our members, guests, and speakers.
- Complies with data protection law and follows good practice.
- Protects the group from the risks of a data breach.

Who and what does this policy apply to?

This applies to all those handling data on behalf of Manchester Luncheon Club e.g.:

- Honorary Secretary
- Honorary Treasurer
- Publicity Secretary
- Administrator

It applies to all data that Manchester Luncheon Club holds relating to individuals, including:

- Names
- Email addresses
- Postal addresses
- Phone numbers
- Any other personal information held (e.g., financial)

2. Roles and responsibilities

Manchester Luncheon Club (through the Committee of the Club) is the Data Controller and will determine what data is collected and how it is used. The Data Protection Officer for the Manchester Luncheon Club is the Honorary Secretary, under the guidance of the Committee of the Club. They are responsible for the secure, fair, and transparent collection and use of data by Manchester Luncheon Club. Any questions relating to the collection or use of data should be directed to the Data Protection Officer. **Everyone** who has access to data as part of Manchester Luncheon Club has a responsibility to ensure that they adhere to this policy.

3. Data protection principles

❖ We fairly and lawfully process personal data in a transparent way.

Manchester Luncheon Club will only collect data where lawful and where it is necessary for the legitimate purposes of the group.

- A member's name, title, address, email and contact phone numbers, will be collected when they first join the Manchester Luncheon Club and will be used to contact the member regarding Manchester Luncheon Club membership, administration, and activities. Other data may also subsequently be collected in relation to their membership, including their payment history for their membership and other related expenses such as Luncheons and communications history. Where possible Manchester Luncheon Club will anonymise this data.
 - Lawful basis for processing this data: Contract (the collection and use of data is fair and reasonable in relation to Manchester Luncheon Club completing tasks expected as part of the individual's membership).
- The name and contact details of members and officers will be collected when they take up a position and will be used to contact them regarding club administration related to their role.
 - Lawful basis for processing this data: Contract (the collection and use of data is fair and reasonable in relation to Manchester Luncheon Club completing tasks expected as part of working with the individuals),
- An individual's name and contact details will be collected when they make a booking for an Event. Other data may also subsequently be collected in relation to their booking, including their payment. This will be used to contact them about their booking.

- Lawful basis for processing this data: Contract (the collection and use of data is fair and reasonable in relation to Manchester Luncheon Club completing tasks expected as part of the booking),
- An individual's name, contact details and other details may be collected at any time (including when booking for an Event), with their consent, in order for Manchester Luncheon Club to communicate with them about and promote club activities.
 - Lawful basis for processing this data: Consent (see 'How we get consent')
- ❖ We only collect and use personal data for specific, explicit, and legitimate purposes and will only use the data for those specified purposes.
- When collecting data, Manchester Luncheon Club will always provide a clear and specific privacy statement explaining to the subject why the data is required and what it will be used for.
- ❖ We ensure any data collected is relevant and not excessive.
- Manchester Luncheon Club will not collect or store more data than the minimum information required for its intended purpose. e.g., we need to collect telephone numbers from members in order to be able to contact them about Manchester Luncheon Club Events, but data on their status or sexuality will not be collected, since it is unnecessary and excessive for the purposes of the club's administration.
- ❖ We ensure data is accurate and up to date.
- Manchester Luncheon Club will ask members and officers to check and update their data every two years. Any individual may update their data at any point by contacting the Data Protection Officer.
- ❖ We ensure data is not kept longer than necessary.
- Manchester Luncheon Club will keep records for no longer than is necessary in order to meet the intended use for which it was gathered (unless there is a legal requirement to keep records).
- The storage and intended use of data will be reviewed in line with Manchester Luncheon Club's data retention policy. When the intended use is no longer applicable (e.g., contact details for a member who has left the Club), the data will be deleted within a reasonable period.

- ❖ We keep personal data secure.

Manchester Luncheon Club will ensure that data held by us is kept secure.

- Electronically held data will be held within a password-protected and secure Environment.
- Passwords for electronic data files will be re-set each time an individual with data access leaves their role/position.
- Access to data will only be given to relevant Committee Members where it is clearly necessary for the running of the club. The Data Protection Officer will decide in what situations this is applicable too and will keep a master list of who has access to data.

4. Individual rights

When Manchester Luncheon club collects, holds and uses an individual's personal data that individual has the following rights over that data. Manchester Luncheon Club will ensure its data processes comply with those rights and will make all reasonable efforts to fulfil requests from an individual in relation to those rights.

- **Right to be informed:** whenever Manchester Luncheon Club collects data it will provide a clear and specific privacy statement explaining why it is being collected and how it will be used.
- **Right of access:** individuals can request to see the data Manchester Luncheon Club holds on them and confirmation of how it is being used. Requests should be made in writing to the Data Protection Officer and will be complied with free of charge and within one month. Where requests are complex or numerous this may be extended to two months
- **Right to rectification:** individuals can request that their data be updated where it is inaccurate or incomplete. Manchester Luncheon Club will request that members, and officers check and update their data every two years. Any requests for data to be updated will be processed within one month.
- **Right to erasure:** individuals can request for all data held on them to be deleted. Manchester Luncheon Club's data retention policy will ensure data is not held for longer than is reasonably necessary in relation to the purpose it was originally collected. If a request for deletion is made, we will comply with the request unless:
 - There is a lawful reason to keep and use the data for legitimate interests.
 - There is a legal requirement to keep the data.

5. How we get consent

Manchester Luncheon Club will regularly collect data from consenting enquiries to contact them to promote Events, Club news, and other Club activities.

Whenever data is collected for this purpose, we will provide:

- A method for users to show their positive and active consent to receive these communications (e.g., a 'tick box')
- A clear and specific explanation of what the data will be used for (e.g., 'Tick this box if you would like Manchester Luncheon Club to send you email details about our forthcoming Events, and opportunities to get involved')
- Data collected will only ever be used in the way described and consented to.
We do not use email data to market 3rd-party products.



Data Retention

6. Overview

Introduction

This sets out how Manchester Luncheon Club will approach data retention and establishes processes to ensure we do not hold data for longer than is necessary. It forms part of Manchester Luncheon Club's Data Protection and Retention Policy.

Roles and responsibilities

Manchester Luncheon Club is the Data Controller and will determine what data is collected, retained and how it is used. The Data Protection Officer for Manchester Luncheon Club is the Honorary Secretary, along with the Committee of the Manchester Luncheon Club, is responsible for the secure and fair retention and use of data by Manchester Luncheon Club. Any questions relating to data retention or use of data should be directed to the Data Protection Officer.

Regular data review

A regular review of all data will take place to establish if Manchester Luncheon Club still has good reason to keep and use the data held at the time of the review. A data review will be held every 2 years and no more than twenty-seven calendar months after the last review. The first review will take place in March 2025.

Data to be reviewed.

- Manchester Luncheon Club stores data on digital documents (e.g., Spreadsheets) stored on personal devices held by the Administrator, Honorary Secretary, Honorary Treasurer and Publicity Secretary
- Physical data stored at the home of the Administrator, Honorary Secretary, Honorary Treasurer and Publicity Secretary

The review will be conducted by the Data Protection Officer with other Manchester Luncheon Club Officers and or Committee Members to be decided on at the time of the review.

How data will be deleted

- Physical data will be destroyed safely and securely, including shredding.
- All reasonable and practical efforts will be made to remove data stored digitally.
 - Priority will be given to any instances where data is stored in active lists (e.g., where it could be used) and to sensitive data.

- Where deleting the data would mean deleting other data that we have a valid lawful reason to keep (e.g., On old emails) then the data may be retained safely and securely but not used.

7.Criteria

The following criteria will be used to make a decision about what data to keep and what to delete.

Question	Action	
	Yes	No
Is the data stored securely?	No action necessary	Update storage protocol in line with Data Protection policy
Does the original reason for having the data still apply?	Continue to use	Delete or remove data
Is the data being used for its original intention?	Continue to use	Either delete/remove or record lawful basis for use and get consent if necessary
Is there a statutory requirement to keep the data?	Keep the data at least until the statutory minimum no longer applies	Delete or remove the data unless we have reason to keep the data under other criteria.
Is the data accurate?	Continue to use	Ask the subject to confirm/update details
Where appropriate do we have consent to use the data. This consent could be implied by previous use. and engagement by the individual	Continue to use	Get consent
Can the data be anonymised	Anonymise data	Continue to use

8. Statutory requirements

Data stored by Manchester Luncheon Club may be retained based on statutory requirements for storing data other than data protection regulations. This might include but is not limited to:

- Details of payments made and received (e.g., in bank statements and accounting records)
- Committee meeting minutes
- Contracts and agreements with suppliers e.g., Hotels
- Insurance details

9. Other data retention procedures

Member data

When a member leaves Manchester Luncheon Club and all administrative tasks relating to their membership have been completed any potentially sensitive data held on them will be deleted – this might include bank details. Unless consent has been given data will be removed from all email mailing lists. All other data will be stored safely and securely and reviewed as part of the next two- year review.

Non-member data

After the Event they have booked for has taken place, their data will be removed as soon as is practically possible. All other data will be stored safely and securely and reviewed as part of the next two- year review.

Mailing list data

If an individual opts out of a mailing list their data will be removed as soon as is practically possible. All other data will be stored safely and securely and reviewed as part of the next two-year review.

Other data

All other data will be included in a regular two-year review.